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May 29, 2013

VIA ECF

Magistrate Judge Cheryl L. Pollak
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**RE: Civil Action No. 1:13-cv-01353-WFK-CLP
Ginsberg v. Dynamic Recovery Solutions, LLC**

Dear Magistrate Judge Pollak:

I represent the plaintiff in the above referenced matter and am informing the Court that the plaintiff has just accepted the defendant's offer of settlement. Therefore, the plaintiff requests that the Court provide that the parties may seek to reopen the matter for forty-five days instead of thirty so that the plaintiff can be assured that the funds clear my escrow account. Thank you for the Court's consideration of the foregoing.

Very truly yours,

/s/ Maxim Maximov

Maxim Maximov, Esq.